

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

ELISABETH CLEVELAND, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

WHIRLPOOL CORPORATION,

Defendant.

Case No. 20-cv-1906(WMW/KMM)

**JOINT STIPULATION TO STAY  
DEFENDANT WHIRLPOOL  
CORPORATION'S ANSWER DEADLINE**

IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective counsel, subject to the approval of the Court, that Defendant Whirlpool Corporation's deadline to answer Plaintiff's First Amended Class Action Complaint (Doc. 25) shall be stayed pending preliminary and final approval of the parties' settlement of this matter together with the Coordinated Actions. The following good cause exists for granting the stipulated stay:

1. The parties have engaged in resolution negotiations over the course of several months starting with a mediation on April 27, 2021 and continuing with the assistance of the mediator through July 29, 2021, when the parties reached an agreement to resolve this matter together with the Coordinated Actions through a nationwide class settlement.

2. On July 27, 2021, the Court entered its order granting in part and denying in part Whirlpool's Motion to Dismiss (Doc. 58), resulting in Whirlpool's deadline to answer the remaining claims by August 10, 2021.

3. The parties are presently planning the orderly presentation of the class settlement for preliminary approval to resolve this matter together with the Coordinated Actions, and will

submit a status report to the Court by August 10, 2021, advising of the status of that planning and the proposed schedule to present the settlement for preliminary approval.

4. Given the imminent settlement approval proceedings and the likelihood that Plaintiffs in the Coordinated Actions will file a consolidated amended complaint further coordinating the actions for resolution purposes, the parties are in agreement that Whirlpool's deadline to answer the First Amended Class Action Complaint should be stayed.

Dated: August 3, 2021

*s/ Andrew M. Unthank*

**WHEELER TRIGG O'DONNELL LLP**

Galen D. Bellamy  
(Admitted *pro hac vice*)  
Andrew M. Unthank  
(Admitted *pro hac vice*)  
370 Seventeenth Street, Suite 4500  
Denver, CO 80202  
(303) 244-1800  
bellamy@wtotrial.com  
unthank@wtotrial.com

**WINTHROP & WEINSTINE, P.A.**

Thomas H. Boyd, #0200517  
Kyle R. Kroll, #0398433  
Mary S. Riverso, #0400224  
225 South Sixth Street, Suite 3500  
Minneapolis, MN 55402  
(612) 604-6400  
tboyd@winthrop.com  
kkroll@winthrop.com  
mriverso@winthrop.com

*Attorneys for Defendant, Whirlpool Corporation*

*s/ Harper Segui*

Rachel Soffin  
(Admitted *pro hac vice*)  
Harper Segui  
(Admitted *pro hac vice*)  
**MILBERG COLEMAN BRYSON**  
**PHILLIPS GROSSMAN, LLP**  
800 S. Gay Street, Suite 1100  
Knoxville, TN 37929  
T: 865-247-0080  
F: 865-522-0049  
rsoffin@milberg.com  
hsegui@milberg.com

Michelle J. Looby  
GUSTAFSON GLUEK PLLC  
Canadian Pacific Plaza  
120 South 6<sup>th</sup> Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-844  
mlooby@gustafsongluek.com

*Attorneys for Plaintiff and Putative Class*